

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

COMPANY DOE,
Plaintiff,

v.

INEZ TENENBAUM, Chair of the Consumer
Product Safety Commission; and CONSUMER
PRODUCT SAFETY COMMISSION,
Defendants.

PUBLIC CITIZEN; CONSUMER FEDERATION
OF AMERICA; and CONSUMERS UNION,
Objectors to Seal.

**Civil No. 11-2958
Hon. Alexander Williams, Jr.**

MOTION TO INTERVENE

Public Citizen, Consumer Federation of America, and Consumers Union (collectively, “Consumer Groups”) hereby move to intervene under Rule 24(b) for the purpose of appealing the July 31, 2012, order granting plaintiff’s motion to seal (including its request to proceed under a pseudonym) and denying Consumer Groups’ motion to unseal.

A memorandum stating the grounds for intervention and a proposed order accompany this motion. For a pleading setting out the intervenors’ First Amendment and common-law claims, *see* Fed. R. Civ. P. 24(c), Consumer Groups respectfully refer the Court to Consumer Groups’ Objections Under Local Rule 105(11) to Plaintiff’s Motion To Seal and To Proceed Under a Pseudonym (filed Oct. 31, 2011, docket number under seal).

Dated: August 7, 2012

Respectfully submitted,

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